

IRMC 200

**INCIDENT RESPONSE MANUAL CHAPTER
INCIDENT RESPONSE PLAN**

DRAFT

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1. PURPOSE

The purpose of the Incident Response Manual Chapter (IRMC) 200, "Incident Response Plan," is to define how the NRC will implement its Incident Response (IR) Program, as described in Management Directive (MD) 8.2. The following are the Program's response objectives, as listed in MD 8.2 and IRMC 100, and associated actions required to meet the objectives.

- Oversight of the licensee's response
 - Verify that licensee response priorities and actions are in the interest of public health and safety.
 - Provide direction in the form of an order in limited, rare circumstances to direct the licensee's onsite response.
- Assessment of the event conditions
 - Independently assess plant conditions.
 - Independently assess radiological release implications and Protective Action Recommendations.
- Coordination with Federal, State, international, Tribal, Territorial, and local response organizations
 - Assist/support Federal response activities per the National Response Framework and the National Disaster Recovery Framework.
 - Assist/support State/Local decision-makers and response officials.
- Information sharing with the public, media, and other stakeholders.

2. RESPONSIBILITIES AND AUTHORITIES

The following documents define the NRC IR Program.

- *MD 8.2, "NRC Incident Response Program"*
 - Describes Program roles, responsibilities, and objectives.
- *IRMC 100, "Program Administration"*
 - Establishes administrative processes and guidelines for how the IR Program is to be managed, updated, and reviewed.
- *IRMC 200, "Incident Response Plan"*
 - Provides guidance and instruction for implementation of response actions in the event of an incident.
- *Incident Response Procedures (IRPs)*
 - Provides detailed instructions to implement programmatic elements described in the IRMCs.

Additional information on counterparts and coordination can be found in Section 5.0

3. CONCEPT OF OPERATIONS

3.1 *Types of Incidents*

The NRC IR Program is intended to respond to a broad variety of incidents that typically pertain to NRC licensees and licensed facilities. Regardless of the scope and nature of the incident, the objectives of the response organization remain the same. The Program is flexible enough to support any anticipated requests from other Federal agencies, e.g., the support to the U.S. Department of State in response to the Fukushima event. To this end, all incident types will have a scalable response using the same organization and processes.

Incidents that impact the NRC's ability to maintain its essential functions are managed by the Continuity of Operations Program (COOP). Additional information can be found in MD 6.2, "Continuity of Operations Program," and the agency COOP Plan (Agencywide Documents Access and Management System (ADAMS) ML14024A688).

3.2 *Response Program Modes*

There are two modes of operation for the IR Program:

Normal

Defined as routine operations when the IR Program is not activated. The Headquarters Operations Officers are available at all times to receive event reports from licensees and to provide essential notifications to NRC management and other Federal agencies. Events that do not warrant activation of the IR Program are managed by normal processes, such as resident inspector follow-up.

Activated

Defined as continuous (24/7) staffing by NRC responders under the NRC IR Program, as described in this IRMC.

To activate the IR Program, appropriate Senior NRC Leadership will conduct a decision-maker's conference call and determine that the event warrants continuous NRC oversight, in accordance with IRP 201, "Response Decision Making." Deactivating the IR Program is decided by the Response Director in consultation with appropriate Senior NRC Leadership based on event conditions, in accordance with IRP 210, "Response Director."

3.3 *Incident Command*

The NRC's response is built upon key concepts of the national preparedness and response doctrine and the Incident Command System (ICS) with adaptations appropriate for NRC-specific response. Key ICS concepts that were used for the NRC response structure are:

ICS Concept	Description
Common Terminology	Using common terminology helps to define organizational functions, incident facilities, and position titles.
Modular Organization	The overall organizational structure will not change due to a differing event, but the size of teams and their organization adjusts to the size and complexity of the incident. Teams can be subdivided and expanded as the event circumstances dictate, but new teams or positions should not be created since this would change the structure.
Unity of Command	Every individual has one designated supervisor to whom they report. This includes incorporating elements with different geographic and functional responsibilities into one response organization.
Management by Objective	Establishing overarching objectives and implementing strategies based on those objectives helps to ensure the response is unified and focused. This is accomplished primarily through the NRC Action Plan to develop and maintain objectives, strategies, and priorities for a unified response.
Manageable Span of Control	Supervisors, at all levels, must effectively control the actions of personnel under their supervision. Span of control limits the number of personnel working directly for a single supervisor; the NRC IR Program limits this to five direct reports.

3.4 Staffing and Location

The IR Program staffs positions with qualified responders from across the agency. The training and qualification of these responders are described in IRP 130, “Responder Training and Qualification.”

Staffing during events is implemented by IRP 250, “Planning Section.” The flexible nature of the IR Program allows functions to be executed at various locations, as needed, based upon the circumstances of the event. Staffing locations are determined by the event and the function being accomplished. For example, functions requiring secure communications require secure facilities; functions requiring data collection from a licensee are typically best accomplished at the licensee’s response facilities; functions providing routine technical review or administrative support could typically be performed from any location, etc. The NRC would likely manage most of the response from either a Regional Incident Response Center (IRC) or the Headquarters Operations Center (HOC), but if communications at those locations were challenged, then the response organization, or key portions of the response organization, could be moved to the licensee’s Emergency Operations Facility (EOF) or other appropriate location.

Although NRC responders can be located at any appropriate location, the following facilities are the appropriate response locations for NRC staff:

- Headquarters Operations Center
- Regional Incident Response Centers
- Licensee response facilities
- State/Local response facilities
- Federal response facilities
- Telework locations

The HOC and IRCs are maintained in a state of readiness, able to accommodate responders at any time. NRC responders would be dispatched to the other locations, as appropriate.

3.5 *Software and Technology*

The HOC and IRCs are maintained with information technology systems and redundant communications capabilities, as well as certain response software programs. These systems, capabilities, and response-specific software are required to facilitate the NRC IR Program missions. Management of these tools is described in IRP 102, "Response Tool Management." The full list of tools is provided in IRP 202, "General Response Procedure," and operational guidance on the use of these tools is provided in relevant 200 series IRPs.

3.6 *Response Procedures*

The 200 series IRPs are used for responders during incident response. The 20X procedures are general in nature. The 21X through 26X procedures focus on specific teams. For example, 24X procedures are related to the Operations Section.

Response procedures are organized in a standard format, which allows responders to rapidly implement the procedures while prioritizing their actions.

- The "Responsibilities/Instructions" section of each response procedure lists the primary functions or responsibilities in one to three pages. This section is kept as concise as possible while including all the responsibilities for the responder or team. This section serves as an ongoing checklist, where responders periodically review their assigned tasks to ensure all responsibilities are being accomplished with the appropriate priority based on the current circumstances. Consistent with keeping this section concise, common abbreviations are used without spelling them out, and "Appendix" is abbreviated "App." when placed at the end of a sentence. Abbreviations are spelled out in the "Acronyms and Definitions" section.
- Appendices in the response procedures provide detailed guidance on procedural steps. Sub-appendices provide templates, tables, user guides, etc., to provide even further levels of detail.
- The final appendix in each team response procedure is referred to as a "hard card." It summarizes procedural steps in a single-page table which allows the team to easily annotate which team member is responsible for each of the tasks identified.

4. RESPONSE ORGANIZATION

The organization chart below shows the high-level functional components of the NRC Response Organization. Adherence to this functional organization establishes clear lines of supervisory authority and formal reporting relationships. The functional structure remains the same for all events, but staffing is adjusted in each functional component based on priorities and workload for the specific event. The full list of all response functions for responders is contained in IRP 202, “General Response,” as the NRC Capabilities.

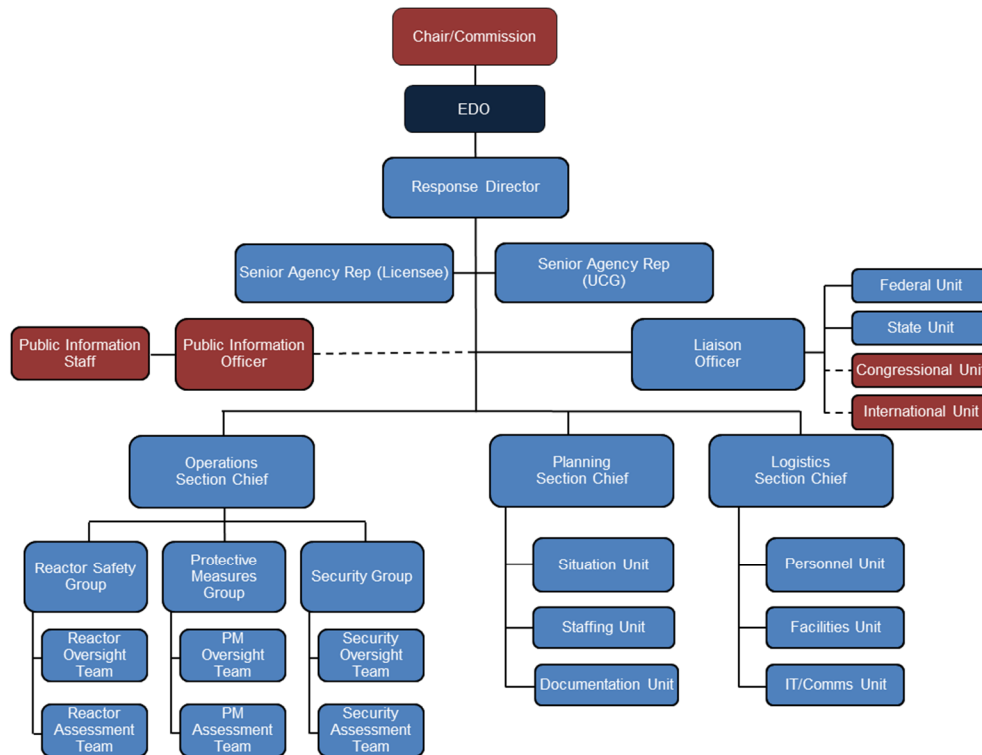


Figure 4.1 – Incident Response Organization Chart

4.1 Senior NRC Leadership

The NRC Chair serves as the principal executive officer of the Commission and exercises all the executive and administrative functions of the Commission; the Chair is also the official spokesperson of the Commission consistent with Section 201 of the Energy Reorganization Act of 1974 and Section 2 of the Reorganization Plan No. 1 of 1980 (Reorganization Plan No. 1) and the Chair’s responsibilities delineated in Chapter 1 of the Commission Internal Procedures. Pursuant to Section 1 of Reorganization Plan No. 1, the Commission is responsible for setting agency policy, rulemaking with certain exceptions, and orders and adjudications. The responsibility for the discharging operational and administrative functions necessary for the day-to-day operations of the agency has been delegated to an Executive Director for Operations (EDO) appointed by the NRC Commission, with the Chair having oversight authority to ensure the EDO

follows Commission policy. If there is an emergency incident at a facility licensed or regulated by the NRC, the Chair may invoke emergency powers as described in Section 3 of the Reorganization Plan of 1980 to manage the response to the facility incident. To the extent possible, the agency will follow the normal NRC decision-making structure established in Reorganization Plan No. 1 (described above) and delegations of authority will continue to exist.

If an emergency occurs at an NRC-licensed facility and if the Chair declares an emergency triggering emergency authority, then the Chair exercises oversight in accordance with the emergency authorities as described in Chapter 1 of the Commission internal procedures and may act consistent with Section 3 of the Reorganization Plan No. 1 of 1980. Under this authority, the Chair would assume all functions vested in the Commission pertaining to an emergency concerning a facility or materials licensed by the agency, including the following: declaring, responding, issuing orders, determining specific policies, advising civil authorities and the public, and directing and coordinating actions relative to the emergency incident.

If the Chair invoke their emergency powers under section 3(a) emergency authorities, the Response Director will be required to obtain delegations authority from the Chair to exercise any emergency functions the Chair chooses to delegate to either the Response Director (RD), Senior Agency Representative (SAR) (licensee), or SAR (Unified Coordination Group).

The IR Program is structured to execute the Chair's and Commissioners' direction and priorities without requiring the Chair or Commissioners to be physically present at designated NRC response facilities, although the Chair and Commissioners may choose to be present.

The EDO provides additional direction and priorities to the IR Program to ensure Chair and Commission priorities and direction are met. Additionally, the EDO will ensure that staff and resources are provided to the response commensurate with agency priorities. If the NRC is responding to an emergency at an NRC-licensed facility or involving a licensee, the RD is responsible for operational elements of the response, to include keeping the EDO, Chair, Commissioners, and other Senior NRC Leadership fully and currently informed of any ongoing response activities and aligning on priorities and direction. Specific processes for these RD and Senior NRC Leadership interactions can be found in IRP 201, "Response Decision-making" and IRP 210, "Response Director."

The Regional Administrators or Program Office Directors, in consultation with EDO, may provide additional direction and priorities to the IR Program.

4.2 *Response Director (RD)*

The Response Director (RD) has the overall operational authority and responsibility for the NRC's response activities and for ensuring an effective and efficient response. In consultation with Senior NRC Leadership, Command Staff,¹ and Section Chiefs,² the RD

¹ Command staff includes the RD, PIO, SAR(s), and Liaison Officer.

² Section Chiefs include the Operation Section Chief, the Planning Section Chief, and the Liaison Section Chief.

sets response objectives for each operational period, and ensures they are carried out. General responsibilities include:

- Provides central point where all information related to the incident is received and analyzed, incident priorities are determined, strategies are developed, and critical resources are assigned to tactical operations.
- Keeps the EDO, Chair, Commissioners, and other Senior NRC Leadership fully and currently informed of any ongoing response activities and aligning on priorities and direction. When interacting with the Chair or the Commission, the RD reports through the EDO.
- Ensures coordination between involved Federal agencies, response partners, and State, local, Tribe, Territories (SLTT) authorities.
- Ensures that the goals/missions of the NRC's Incident Response Program are met during a response.
- Ensures the safety of all NRC responders.

4.3 Senior Agency Representative (SAR)

The SAR acts as a spokesperson for NRC response during radiological events. This person reports to the RD and interfaces primarily with the Licensee and/or Unified Coordination Group (UCG) at those respective external stakeholders' locations. The RD remains the NRC authority responsible for all agency actions and for fulfilling the NRC's role under the National Response Framework, but the RD may delegate functions as appropriate to SARs.

The SAR-Licensee acts as the spokesperson, in consultation with the Chair and Response Director, for NRC response at a licensee's emergency facilities during radiological events. This person interfaces primarily with the licensee's emergency director, but may also interact with media, public, and State/Local government officials.

The SAR-UCG acts as the spokesperson for NRC response at the Joint Field Office (JFO) during radiological events. This person interfaces primarily with the other members of the UCG.

4.4 Public Information Team

The Public Information Officer/Staff provides continuous support during an incident or accident to ensure that accurate information is reaching the public. Once the agency is involved in a response, this group is necessary to produce coordinated messages to inform the public.

The Public Information Officer, under the supervision of the Chair and in consultation with the Response Director, determines any limits on information releases.

Public Affairs Officers from the Office of Public Affairs (OPA) are available in each region and Headquarters and will make up the bulk of the Public Information Staff due to their experience with dealing with public inquiries and information sharing.

The Public Information Officer is the Director of OPA or delegate.

4.5 *Liaison Team*

The Liaison Team is responsible for the response activities and interactions with representatives of Federal, SLTT, Congressional, and international organizations. The Liaison Officer has four supporting units:

- Federal Liaison Unit – coordinates with other Federal agencies.
- State Liaison Unit – coordinates with the government organizations for State, Local, Tribal, territories, and regional Federal agencies.
- Congressional Liaison Unit – The Congressional Liaison Lead (OCA Director or designee), under the supervision of the Chair and in consultation with the Response Director, coordinates with Federal congressional representatives and their staffs.
- International Liaison Unit – The International Liaison Lead (OIP Director or designee), under the supervision of the Chair and in consultation with the Response Director, coordinates with governments other than the United States, directly or through the United States Department of State.

4.6 *Operations Section*

The Operations Section is responsible for licensee oversight and independent technical assessment during NRC response to events. The Operations Section is led by an Operations Section Chief who coordinates and prioritizes actions for the Reactor Safety Group, Protective Measures Group, and Security Group. For non-reactor events, the Reactor Safety Group is replaced with either the Fuel Cycle Safety Group or the Materials Safety Group.

The following are descriptions of the Operations Section Groups:

4.6.1 *Reactor Safety Group (RSG)*

The RSG performs the independent technical assessment of current plant conditions and prognosis and conducts licensee oversight for the Operations Section during NRC response to events.

4.6.2 *Protective Measures Group (PMG)*

The PMG performs the independent assessment of radiological conditions and conducts licensee oversight for the Operations Section during NRC response to events.

4.6.3 *Security Group (SG)*

The SG performs the independent assessment of the licensee's physical and cyber security status and protection systems, including the security/safety

interface, and conducts licensee oversight, intelligence assessments, and security assessments of other potentially effected licensees for the Operations Section during NRC response to events.

4.6.4 Fuel Cycle Safety Group (FCSG)

The FCSG performs the independent technical assessment of current facility conditions and prognosis and conducts licensee oversight functions for the Operations Section during NRC response to incidents that impact one or more fuel cycle facilities.

4.7 **Planning Section**

The Planning Section collects and disseminates incident situation information to the RD and other responders, primarily through the Response Status Report (RSR) and the NRC Action Plan. The Planning Section also coordinates response staffing and recordkeeping. The Planning Section is composed of three units:

- Situation Unit – coordinates overall situational awareness during NRC response to events, generates the Response Status Report, and maintains the NRC Action Plan.
- Staffing Unit – coordinates the staffing of response personnel to support response efforts.
- Documentation Unit – coordinates overall recordkeeping and distribution of response-related documentation. This unit, when needed, will also coordinate with the Office of the Chief Information Officer (OCIO) for Freedom of Information Act (FOIA) requests.

4.8 **Logistics Section**

The Logistics Section provides logistical support and will assist with the functions, tasks, and activities associated with NRC personnel responding to a radiological or nuclear event. The Section will coordinate and communicate requests between Headquarters Corporate Support Offices such as the Office of Administration (ADM), the Office of the Chief Financial Officer (OCFO), the Office of the Chief Human Capital Officer (OCHCO), and the OCIO, and regional Division of Resource Management and Administration (DRMA) divisions. The Section is composed of three units:

- Personnel Unit – coordinates and provides support for personnel issues (e.g., responder safety, deployment, travel, time and attendance, pay caps, Employee Assistance, financial arrangements, and budget adjustments, etc.).
- Facilities Unit – coordinates resolution of response facility issues (e.g., building access, facility maintenance and operations, space management, security issues, badging, parking arrangements, transportation and subsidies, supplies,

etc.).

- Information Technology /Communications Unit – coordinates resolution of any information technology or communication issues (e.g., NRC Operations and Incident Response Centers infrastructure, Automatic Notification System, information technology equipment, equipment loans, phones, etc.).

5. RESPONSE COORDINATION

The following sections describe the NRC's coordination roles with respect to the IR Program.

5.1 *NRC and Licensee*

NRC licensees are responsible for mitigating the consequences of incidents by implementing their approved emergency and security plans. These emergency plans include event classification, notifications to the NRC, State, Local, and Tribal officials, assessment of dose consequences, and protective action recommendations. The primary responsibility for mitigating an incident remains with the licensee.

For incidents involving facilities (reactors, fuel facilities, independent spent fuel storage installation, etc.) or materials licensed by the NRC or an Agreement State, the NRC conducts oversight by performing an independent assessment of the incident. This independent assessment can be performed through standard NRC oversight functions or through the IR Program. Data is collected, verified, analyzed, and evaluated by NRC staff to arrive at an independent assessment of the situation and determine the adequacy of safety and protective measures being recommended or implemented. The NRC, under its statutory authorities, may, in rare and unusual circumstances, direct the licensee's onsite response in the form of an order.

5.2 *NRC and State/Local/Tribal/Territorial Governments*

State/Local/Tribal/Territorial government officials are responsible for deciding on and implementing appropriate public protective actions during a radiological emergency. They are responsible for issuing protective actions to the public such as evacuation, sheltering in place, or administering potassium iodide. These officials base their decisions on recommendations from plant personnel and their own radiological or health organizations.

While not responsible for offsite protective actions, the NRC maintains awareness of offsite conditions and activities pertaining to the NRC mission of protecting public health and safety. When requested, the NRC advises, guides, and supports State/Local/Tribal/Territorial government officials. Neither a licensee nor the NRC can order the public to take protective actions. However, the NRC will have developed a position as to the adequacy of protective actions and will be available for consultation upon request.

5.3 *NRC and Other Federal Agencies*

The NRC participates in the larger Federal response effort through the coordinating structures established by Presidential Policy Directive 8 (PPD-8), "National

Preparedness,” Homeland Security Presidential Directive 5 (HSPD-5), “Management of Domestic Incidents,” and PPD-44, “Enhancing Domestic Incident Response.” Federal response policy describes these coordinating structures in the National Preparedness Goal, National Response and Disaster Recovery Frameworks, Federal Interagency Operational Plans, and the Nuclear/Radiological Incident Annex (NRIA).

As the Primary Federal Authority (PFA) under the NRIA, the NRC will coordinate the Federal response to incidents at NRC licensed facilities. For example, during minor events that do not require significant Federal engagement, the NRC would be the sole coordinator for Federal support. However, for incidents with offsite consequences, the Federal Emergency Management Agency (FEMA) may assume coordination of the Federal response for offsite support. The NRC will remain the PFA for onsite response.

In an event in which FEMA deploys to assist incident management in the affected State, the NRC will participate in the UCG and/or JFO. The NRC is prepared to both deploy to and embed representatives from numerous Federal agencies, including but not limited to FEMA, Department of Energy, Department of Homeland Security, and Environmental Protection Agency. While coordination of and with the larger Federal response occurs in several venues for NRC incident response, overall management of the NRC’s capabilities in Federal response resides with the Headquarters element of the IR Program.

The NRC also maintains several Memoranda of Understanding (MOU) related to incident response with other Federal agencies:

- FEMA: Dated 2015, ADAMS ML15344A371. This MOU primarily relates to Emergency Preparedness but does discuss Preliminary Capabilities Assessments and Disaster Initiated Reviews as explained in detail in Inspection Manual Chapter 1601, as referenced in IRP 230, “Liaison Team.”
- Federal Radiological Monitoring and Assessment Center (FRMAC): Dated 2011, ADAMS ML110540247. This MOU relates to mutual support between the NRC and the Department of Energy National Nuclear Security Administration with respect to cross training and exercise participation.
- Interagency Modeling and Atmospheric Assessment Center (IMAAC): Dated 12/15/2004, ADAMS ML050060060. This MOU relates to the sharing of dose assessment source term and modeling information during events to develop a single source of Federal hazards prediction, as referenced in IRP 242, “Protective Measures Group.”

6. RECOVERY

Disaster Recovery (or Recovery) is the phase of the emergency management cycle that begins with the stabilization of the incident and ends when the community has recovered from the disaster's impacts. The term "incident stabilization" refers to the point in time at which the immediate threats to human safety and property resulting from the physical impacts of the primary and secondary hazard agents have been resolved. Recovery includes rebuilding damaged structures, restoring infrastructure services, and returning the community to its normal patterns of activity.

Depending upon the nature of the incident, NRC incident response efforts may overlap with recovery efforts, which could initiate very quickly after an incident. Recovery may include both onsite and offsite considerations, including but not limited to activities in accordance with existing regulations, the National Disaster Recovery Framework, the Price-Anderson Act, the NRIA to the Response and Recovery Federal Interagency Operational Plans, and the Recovery Support Strategy developed for the incident.